

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA

v.

No. 07-4059 (L)

PAULETTE MARTIN, et al.

\* \* \* \* \*

**MOTION TO EXTEND TIME FOR BRIEFING**

Comes now Appellant herein, Paulette Martin, by and through her counsel, Michael D. Montemarano, Esq., and Michael D. Montemarano, P.A., as appointed counsel pursuant to the CJA, and as lead appellate counsel for the five other Appellants herein, and does move for the extension of the time for the briefing of this matter, and in support thereof does state:

1. The Joint Brief of Appellants is due on September 10, 2010, per the current briefing order.
2. Lead appellate counsel (undersigned) was contacted last week by Alan Dexter Bowman, Esq., counsel for Co-Appellant Lanora Ali (in related case #07-4062), relative to his need for additional time for submitting materials regarding his client to lead counsel for inclusion in the joint brief and JA. *See Appellants' Motion to Extend Time for Briefing*, filed August 10, 2010. Lead appellate counsel was informed that Bowman would submit his materials<sup>1</sup> to counsel by September 10, 2010.

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<sup>1</sup> "Materials" should be understood, as lead counsel has instructed Bowman, to include the following *separate items* specific to his client: a list of materials identified for the JA; separate arguments and summaries of each, each to be added into the brief in a unitary whole; a statement of relevant facts to be incorporated by lead counsel into the factual portion of the brief; and a separate table of citations to be incorporated, etc. Lead counsel will be responsible to add the JA references to the brief

3. In addition, new counsel, Daniel Goodman, Esq., United States Department of Justice, recently has entered his appearance for Appellee and he requires time to assimilate this massive case.

4. Counsel for Appellant therefore requests that the time for briefing be extended, and the due date of the Joint Brief of Appellants be rescheduled to no earlier than October 12, 2010.

5. Counsel for Appellant is authorized to state that counsel for Appellee, consents to the grant of the requested relief.

Respectfully submitted,

September 8, 2010

/s/  
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MICHAEL D. MONTEMARANO

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Counsel of Record/CJA Counsel  
For Appellant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on or before this 8<sup>th</sup> day of September, 2010, a copy of the foregoing *Motion to Extend Time for Briefing* was filed via CM-ECF, and served via direct email, on Daniel Greenberg, Esq., US Department of Justice, 36 South Charles Street, Suite 400, Baltimore, MD 21201.

/s/  
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MICHAEL D. MONTEMARANO